

12/31/14

Chairman Tom Wheeler
Commissioner Mignon Clyburn
Commissioner Jessica Rosenworcel
Commissioner Ajit Pai
Commissioner Michael O'Rielly
c/o Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Comments in ET Docket No. 14-165 and GN Docket Nos. 12-268 and 14-166 Via Electronic Filing

Dear Chairman Wheeler, Commissioner Clyburn, Commissioner Rosenworcel, Commissioner Pai, Commissioner O'Rielly and Ms. Dortch,

On behalf of Milwaukee Repertory Theatre, located in Milwaukee, WI, that provides approximately 600 performances a year to 200,000 audience members and education programs to 20,000 students, I write with concern about protection for our wireless microphones and backstage communications devices.

I understand the Commission has ruled that performing arts entities that regularly use 50 or more wireless devices will be eligible to apply for a Part 74 license. I've also learned that the FCC is seeking Comment on a proposed rule that would prevent performing arts entities using fewer than 50 wireless devices from participating in the database. This would leave my organization without any interference protection mechanism from the many TV Band Devices that may soon flood the market. Frequency coordination with other known wireless microphone users has become common practice, but there is no way to coordinate with TVBD's if you don't know about them.

Thousands of performances are held by professional performing arts organizations each year and the use of wireless microphones is both essential to producing high-quality performances and also mitigates against significant public safety concerns. Professional wireless capability, with successful interference protection, is essential to our sector.

The Milwaukee Repertory Theatre use 35 UHF band transmitters, 1 UHF band IFB, 4 UHF band wireless headsets, and 4 2.4 GHz ClearCom headset devices. At a typical point in the season (running six nights a week from September through May), all 8 headsets and at least 8 microphone channels are in use. For a musical or during our annual production of A Christmas Carol, all available inventory is in use and transmitting. This equipment is from TV bands 14 – 31 and 46 – 50, as well as the 2400 – 2480 MHz range. All of our gear is tunable within 60 MHz. We own all of our equipment and are around the middle mark of its 8 – 10 year life expectancy.

MILWAUKEE REPERTORY THEATER

Patty & Jay Baker Theater Complex | 108 E. Wells Street | Milwaukee, WI 53202
Administration: 414-224-1761 | Fax: 414-224-9097 | Ticket Office: 414-224-9490
www.MilwaukeeRep.com | A Member of the United Performing Arts Fund

We are very fortunate to have a lot of options in the frequency range of our equipment, but even with these capabilities we are often tapped out of clear frequencies in our area.

The move out of the 700 MHz band was rough for us at The Rep, as it was for most non-profit theaters. The decision came down around the same time as we changed artistic management – the new management wanted to produce large scale musicals and more equipment purchase was necessary, compounded by the fact that our existing inventory was now no longer usable. I was not with the company at the time, but from our records it seems the theater dipped into our emergency trust money to pay the \$40,000 – 50,000 necessary to replace all the existing gear over the course of the 2010 and 2011 fiscal years. This is no small amount of money for us; it is nearly equivalent to the sound budget for an entire season of 13 shows in 4 venues.

This move out of the 600 band would become more logistically possible with reimbursement from the FCC. Our theatre has already endured the cost of moving out of the 700 band within the past 5 years. We would also need adequate lead time to ensure that manufacturers have done the fine tuning and testing necessary to guarantee that these new products will maintain the high audio quality our audiences have come to expect from our performances.

I appreciate that the Commission has sought Public Comment on these very important issues. Professional performing arts organizations should all have some sort of interference protection. While some entities will be protected by access to the geo-location database, many professional performing arts organizations will not under this plan. Further, I would request that the Commission consider the burden already borne by the performing arts community in vacating the 700 MHz band. I am concerned about the cost of once again replacing my theatre's sound equipment.

Performing arts organizations provide demonstrable service to the public in improving quality of life; preserving our cultural heritage; and in providing education, enlightenment, entertainment. They also contribute to local economies in every community across this country. I respectfully request that the Commission maintain access to interference protection and establish a mechanism to reimburse performing arts organizations for the cost of new equipment.

Sincerely,



Chad Bauman
Managing Director
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108 E. Wells Street
Milwaukee, WI 53202